

January 10, 1994

CD-94-01 (LDV)

Dear Manufacturer:

SUBJECT: Carryover and Carryacross of Model Year 1995 California Durability Data

The enclosed letter was recently issued to Toyota in response to their request to carryacross exhaust emission durability data from a California engine family to a Federal engine family. In addition, EPA's position on this matter was briefly addressed at the Industry/EPA meeting on November 17, 1993.

This letter illustrates EPA's position and is provided for your information and planning purposes. The basic considerations of EPA's approval are the (1) effects on exhaust emission levels of the California fuel and test procedures, (2) effects on deterioration of mileage accumulation using Phase II fuel, and (3) possibility of linecrossing using EPA test fuel and test procedures.

Questions and comments regarding this matter should be addressed to your EPA Certification Representative.

Sincerely,

Robert E. Maxwell, Director
Certification Division
Office of Mobile Sources

Enclosure

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September 16, 1993

Mr. Ed Brune
General Manager
Powertrain Department AA-1
Toyota Technical Center, U.S.A., Inc.
1588 Woodridge, RR#7
Ann Arbor, MI 48105

SUBJECT: Carryacross of MY95 California Durability Data

Dear Mr. Brune:

We have reviewed your letter dated July 19, 1993 requesting approval to carryacross exhaust emission durability data from a California engine family, _____ to Federal engine family, _____. It is understood that both the California and Federal engine families have the same exhaust emission control system however, the evaporative emission control system is different for each of these families. In addition, engine family _____ will comply with the California new evaporative emission standards and test procedures for the 1995 model year. However, Federal engine family _____ will not be subject to the new evaporative emission test procedures.

Our policy on this matter is outlined in Advisory Circular 17F, however, we are in process of developing further guidelines for carryover/carryacross of 1995 and later model year California emission and durability data. Until additional guidelines are developed, we intend to evaluate such requests on a case-by-case basis.

Regarding this request, Toyota supplied additional information in response to our questions and issues. One of our concerns is the test-to-test variability of the data supplied in your July 19, 1993 letter, as related to the linecrossing requirements contained in 40 CFR 86.094-24(f). You indicated Phase II fuel is superior to Indolene in HC, CO, and NOx emissions. In addition, you indicated that the new California evaporative test procedure, which has canister pre-loading, results in higher HC, CO, and NOx emissions than the HC, CO, and NOx emissions of the Federal test procedure. However, we are still concerned about the possibility of linecrossing when using EPA test fuel and test procedures for this vehicle.

Secondly, we are concerned with the catalyst deterioration effect if Phase II mileage accumulation fuel were used on the durability vehicle. You stated that there is no effect on the catalyst because both the durability vehicle and the emission-data vehicle will use currently available in-use fuel (premium unleaded gasoline) for mileage accumulation.

Based on the information you have provided and our current policy as outlined in Advisory Circular 17F, we approve your carryacross request for this engine family. In order to alleviate our concern regarding linecrossing, we request that Toyota conduct additional tests on the durability vehicle at the 50,000 mile and 100,000 mile test point using EPA test fuel and the EPA test procedure.

If there are any questions regarding this matter, please contact Trina Vallion of my staff.

Sincerely,

Eldert Bontekoe
Senior Project Manager
Compliance Programs Branch
Certification Division
Office of Mobile Sources

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